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October 28, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Inc.

Docket 2019-226-E

DOCKET 2019-2

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC"), please find for filing in this docket three late-filed exhibits for inclusion in the evidentiary record of this proceeding as the Commission authorized at the hearing of this matter. The exhibits are:

- 1. Exhibit 8, which shows how each and every requirement of the South Carolina IRP statute, S.C. Code Ann. § 58-37-40, is satisfied by DESC's IRP as filed and supplemented in this proceeding. This exhibit is a response to Late Filed Exhibit 7 of the Southern Alliance for Clean Energy and South Carolina Coastal Conservation League.
- 2. Exhibit 14, which shows how pursuing the South Carolina Solar Business Alliance's proposed Competitive Procurement Action Plan would harm DESC's customers and would otherwise be improper. That plan was submitted in Late Filed Exhibit 13. For the record, DESC objects to the adoption of this plan for the reasons stated in this exhibit.
- 3. Exhibit 17, which presents a short-term action plan for inclusion in DESC's 2020 IRP. This short-term action plan is modeled on the short-term action plans that the two Duke Energy South Carolina utilities submitted with their 2020 integrated resource plans and those submitted by Dominion Energy Virginia and North Carolina in their most recent Virginia and North Carolina IRP proceedings. It responds to the Southern Alliance for Clean Energy and South Carolina Coastal Conservation League's Late Filed Exhibit 16.

October 28, 2020 Page 2



As to the last exhibit, the Company reiterates that a short-term action plan is not a statutorily required component of an integrated resource plan. By submitting this proposed short-term action plan, the Company does not waive its argument that a short-term action plan cannot be used as a vehicle to order substantive actions that are not expressly permitted under Act No. 62, as certain parties are suggesting in this docket.

Please contact me with any concerns or questions.

Respectfully submitted,

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Attorney for Dominion Energy South Carolina, Inc.

cc: All counsel of record